

Trans Solutions Defense and Ed fund.txt

Subject: Transport mitigation

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Sir:

We support staff's recommendation for equalized New Source Review thresholds for transport couples. We support an increased focus on mitigations for transport, using all feasible measures.

In our experience, however, there is a big problem with districts as to 'what actually is feasible.' We have seen a great deal of fingerpointing, legalistic avoidance, shrugging of shoulders, smoke blowing and general ducking of responsibility.

Under the staff presentation given today, this problem would not be addressed. It would be highly desirable if staff were to additionally propose that CARB compile lists of stationary source, mobile source and transportation control measures that it deems feasible on a statewide basis, thereby taking many or most feasibility decisions out of the hands of districts. Then, districts would not be able to weasel out of their responsibility for improving air quality downwind. Furthermore, we would like to see CARB issue sharply delineated guidelines for determining local feasibility of measures that are not on the statewide lists.

--David Schonbrunn

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